

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

SCOTT D. DALESANDRO, et al.,	:	Case No.: C-1-01-109
On behalf of themselves and	:	
all others similarly situated,	:	Judge Sandra S. Beckwith
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE INTERNATIONAL PAPER	:	
COMPANY,	:	
	:	
Defendant.	:	

PLAINTIFFS' REPORT ON THE RESULTS OF THE NOTICE

EXHIBIT 2: DECLARATION OF THERESA L. GROH

FILED UNDER SEAL

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

SCOTT D. DALESANDRO, et al.,	:	Case No.: C-1-01-109
On behalf of themselves and	:	
all others similarly situated,	:	Judge Sandra S. Beckwith
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	AFFIDAVIT OF
THE INTERNATIONAL PAPER	:	STEPHANIE VAALER
COMPANY,	:	
	:	
Defendant.	:	
	:	

Now comes the Affiant, Stephanie Vaaler, and after first being duly sworn and cautioned, states as follows:

1. I am a paralegal at the law firm of Murdock Goldenberg Schneider and Groh, LPA and have worked on the above-captioned case since September 2001 shortly after I joined the firm. I earned my Bachelor of Science degree from the University of Cincinnati in 1983, my post-baccalaureate certificate from the ABA-approved Lawyer's Assistant Program at Roosevelt University in Chicago in 1984, and I have fifteen (15) years experience as a litigation paralegal.

2. Under the supervision of John Murdock and Theresa Groh, I personally took all actions related to the dissemination of Notice to the class members in this case.

3. On September 24, 2003 I sent via First Class United States Mail the Court Ordered Notice to 149 individuals whose names and addresses were provided on a chart prepared by International Paper entitled "Potential Severance Benefits Under Plan #828 for Plaintiffs in Dalesandro, et al. v. International Paper." The Notice was entitled "Court Ordered Notice: Your Rights to Severance Benefits Due to the Termination of Your Employment by International

Paper Company". Attached to the Notice was an Exhibit A entitled "Exhibit A to Class Notice" and the Champion International Corporation Reorganization Severance Policy #828.

4. Eight (8) class members contacted the firm and provided new addresses. Therefore, I sent those eight individuals the same documents described above to two addresses: to the address provided for them by International Paper, and to the updated addresses provided by them.

5. Nineteen (19) of the mailings were returned to Murdock Goldenberg Schneider & Groh, LPA by the U.S. Postal Service as undeliverable at the address listed on the envelope.

a. Five (5) of these were not resent because they were the same individuals described in Par 4 above who had previously supplied updated addresses, and I had already sent a mailing to their new address; the mailings which were returned for these five individuals were those that were sent to the incorrect address provided by International Paper.

b. With regard to the remaining fourteen (14) returned mailings, three (3) were resent to the addresses provided by the class member; five (5) were resent to addresses provided by the U.S. Postal Service; and six (6) were resent to addresses which were retrieved utilizing the FastDataWEB, an internet accessed database product of FirstData which is a service widely utilized by the banking industry.

i. Of the fourteen (14) mailings which were resent, only two (2) were returned; one was resent to an address provided by the class member, the other mailing was resent and returned again.

I sought a good mailing address for this one remaining class

member through several sources, including class representative

Noonan, all without success.

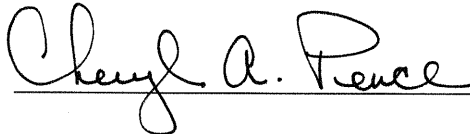
6. In the end, I was able to find and send the Court Ordered Notice and its attachments to each of the 149 class members with only one returned as unsuccessful.

FURTHER AFFIANT SAITH NAUGHT.


STEPHANIE VAALER

STATE OF OHIO)
) S.S.
COUNTY OF HAMILTON)

Sworn to before me and subscribed in my presence, a Notary Public for said State and County, this 18 day of August, 2004.



CHERYL A. PENCE
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 08-05-08